

Comments of the Central States VHF Society

The Central States VHF Society (CSVHFS) is an organization of active VHF, UHF, and microwave experimentally minded radio amateurs. The society's goal is to encourage and promote the use of all the amateur radio allocations above 50 MHz. The CSVHFS has sponsored an annual conference since the early 1970s. These conferences have become world famous among the VHF/UHF/microwave community for their authoritative coverage of subjects related to equipment construction and operation as well as radio wave propagation at frequencies above 50 MHz. Active VHF-oriented radio amateurs from all 50 U.S. states and many foreign countries have attended the conferences over the years.

The CSVHFS, wishes to express its concern over the Commission's intention to permit RF Identification Devices (RFIDs) to operate under the conditions proposed in the Docket. Such operation of these devices poses a major threat to weak signal work around 432 MHz as well as satellite operation at 435 MHz and above. If the U.S. must harmonize with other nations, why not follow the lead of the existing CEPT document and limit the permitted band for these devices to 433.05 - 434.79 MHz. While this still poses a potential interference threat to the amateur service, it would minimize the impact in the critical area around 432 MHz, as well as satellite operation from 435 to 438 MHz. In both of these ranges, amateurs tend to use higher gain antennas and more sensitive receivers than do amateurs occupying other portions of the 70 cm band. Such a move would, we contend, set an example to the rest of the world. Another consideration might be to place these devices in parts of the spectrum where they pose little or no threat of destructive interference to anyone, i.e. 300 - 320 MHz currently used by similar devices. The bands already in use for RF heating devices such as microwave ovens would also seem to be an appropriate place for operation of such equipment.

The CSVHFS rejects the argument that RFIDs operating at the levels and duty cycles proposed, do not threaten amateur operation. If it were to be mandated that they be used only at industrial sites, warehouse complexes, and transportation terminals well away from residential areas; that contention might hold some promise of being true. But, no such limitations are proposed. Thus, it is not beyond the realm of possibility that RFIDs will be widely used by package service companies and be operated frequently

on
delivery vehicles while in residential neighborhoods where amateur
operation
is generally conducted.

One of our members, who is in a position to know about such things, has
noted that such devices have been operating for some time at military
installations in the U.S. This fact may be used by those in favor of
the
proposed operation to claim that the devices pose no threat to amateur
operation. This is a fallacious argument as most military installations
are
in areas relatively far removed from residential neighborhoods. Thus,
citing operation of RFIDs at such sites is not sufficient basis for
claiming
that their unrestricted operation poses no threat to amateur operation.

The CSVHFS urges the Commission not to authorize RFIDs to operate at
the
proposed levels and duty cycles as proposed by SAVI, but to follow one
or
more of the recommendations contained in the filing.

Respectfully submitted:

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